

EXHIBIT G



* 1 0 5 2 1 8 3 6 2 9 *

DISTRICT COURT
FILED

APR 19 2022

IN THE DISTRICT COURT OF TULSA COUNTY
STATE OF OKLAHOMA

AUTO ADVANTAGE FINANCE, LLC

)

DON NEWBERRY, Court Clerk
STATE OF OKLA. TULSA COUNTY

Plaintiff,

)

vs.

)

KIMBERLY AMBUR ROSS and
ALEXANDER JOSEPH ROSS

) No. CS-2020-5574

Judge Kirsten Pace

Defendants.

)

)

)

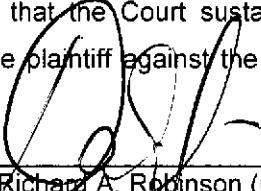
)

MOTION TO ENTER DEFAULT JUDGMENT WITHOUT NOTICE

COMES NOW plaintiff and moves this Court to enter default judgment in favor of the plaintiff against the defendants. In support thereof, plaintiff respectfully shows the Court as follows:

1. Pursuant to 12 O.S. § 2004, the defendants were served with plaintiff's summons and petition.
2. Pursuant to 12 O.S. § 2012, the defendants have not communicated with plaintiff, appeared in open court or entered an appearance by filing a pleading, motion or other document and are therefore in default.
3. Pursuant to *Rule 10 of the Oklahoma District Court Rules*, "notice of taking default is not required where the defaulting party has not made an appearance", and therefore no notice is required for entry of default judgment.

WHEREFORE, plaintiff respectfully requests that the Court sustain plaintiff's motion to enter default judgment and enter a judgment in favor of the plaintiff against the defendants as prayed for in plaintiff's petition.


Richard A. Robinson (OBA# 7684)

Hugh H. Fudge (OBA# 20487)

Dani L. Schinzing (OBA# 32113)

Emily R. Remmert (OBA# 22110)

Sean A. Nelson (OBA# 30194)

Robinson, Hoover & Fudge, PLLC

119 N. Robinson Ave., Suite 1000

Oklahoma City, OK 73102

(405) 232-6464 | (833) 342-0001 Toll Free

lawmail@rhfok.com | (405) 232-6363 fax

Attorneys for Plaintiff